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Attorney for Petitioner United States of America

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND  
MALAMATENIA MAVROMATIS,

Defendants.

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE  
STATUS CONFERENCE FROM  
NOVEMBER 30, 2023 AT 1:30 P.M., TO  
FEBRUARY 22, 2024 at 1:30 P.M. AND  
EXCLUDE TIME UNDER THE  
SPEEDY TRIAL ACT; AND  
ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from  
November 30, 2023, at 1:30 p.m. to February 22, 2024, at 1:30 p.m.

1           1. Defendant BABAK BROUMAND is in custody in the Central District of  
2 California after being convicted at jury trial in the related case of *United States v. Broumand*,  
3 20-224-RGK(A).

4           2. The government has produced over 60,000 pages of discovery to defendant  
5 MAVROMATIS, which primarily consists of business records, including bank, credit card,  
6 mortgage broker, title company, and escrow company records, tax returns, and witness  
7 interview reports.  
8

9           3. On March 24, 2022, the government obtained a superseding indictment in this  
10 case adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in  
11 which she was charged with two counts of False Statements on a Loan Application in  
12 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's  
13 indictment, co-defendant BABAK BROUMAND had already been charged.  
14

15           4. Counsel for both defendants agree that additional time is needed for meaningful  
16 preparation for trial, including additional research and investigation, and discussions with their  
17 clients and the government regarding possible pretrial resolution. The parties are currently  
18 engaged in earnest pretrial resolution discussion that may obviate the need for trial. The  
19 government extended a proposed global disposition on October 19, 2023. The proposed global  
20 disposition relates to tax charges and has required defense counsel to consult with outside  
21 subject matter experts to effectively advise their clients. Thus, both defendants agree more  
22 time is needed to review, and advise their clients on the government's proposed global  
23 disposition in this matter, and prepare for a potential jury trial should negotiations fail.  
24  
25  
26  
27  
28

1           5. The government and counsel for the defendants agree that time be excluded under  
2 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in  
3 pretrial resolution discussions.  
4

5           6. The parties stipulate and agree that excluding time until February 22, 2024, will  
6 allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties  
7 further stipulate and agree that the ends of justice served by excluding the time from November  
8 30, 2023, through February 22, 2024 computation under the Speedy Trial Act outweigh the  
9 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),  
10 (B)(iv).  
11

12           7. The parties are also discussing resolution of this entire matter and require more time  
13 to discuss different settlement alternatives. The parties believe that they are close to reaching  
14 a pretrial resolution.  
15

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17 //

1 8. The undersigned Assistant United States Attorneys certify that they have obtained  
2 approval from all counsel to file this stipulation and proposed order.

3 IT IS SO STIPULATED.

4 DATED: November 28, 2023

/s/ Michael J. Morse  
MICHAEL J. MORSE  
JUAN M. RODRIGUEZ  
Special Assistant United States Attorney

8 DATED: November 28, 2023

/s/ Steven F. Gruel  
STEVEN F. GRUEL  
Counsel for Defendant BROUMAND

11 DATED: November 28, 2023

/s/ Paul H. Nathan  
PAUL H. NATHAN  
Counsel for Defendant MAVROMATIS

14 ORDER

15  
16 Based upon the facts set forth in the stipulation of the parties and for good cause shown,  
17 the Court hereby continues the status conference from November 30, 2023, at 1:30 p.m. to  
18 February 22, 2024, at 1:30 p.m.

19  
20 Furthermore, the Court finds that failing to exclude the time from November 30, 2023,  
21 through February 22, 2024, would unreasonably deny defense counsel and the defendant the  
22 reasonable time necessary for effective preparation, taking into account the exercise of due  
23 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

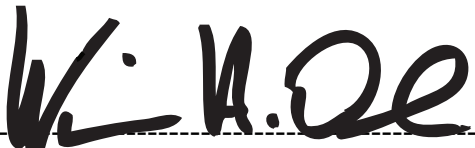
24  
25 The Court further finds that the ends of justice served by excluding the time from  
26  
27  
28

1 November 30, 2023, through February 22, 2024, from computation under the Speedy Trial Act  
2 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and  
3 with the consent of the parties,  
4

5 IT IS HEREBY ORDERED that the time from November 30, 2023, to February 22,  
6 2024, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
7 3161(h)(7)(A), (B)(iv).  
8

9 IT IS SO ORDERED.  
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11  
12 DATED: November 29, 2023

  
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HONORABLE WILLIAM H. ORRICK  
United States District Court